

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	Civil No. 25-CV-10413-IT
	)	
7.23918814 BTC AND OTHER VARIOUS	)	
CRYPTOCURRENCY SEIZED FROM	)	
BINANCE ACCOUNT ASSOCIATED	)	
WITH USER ID XXXXX3280 ON	)	
OCTOBER 25, 2024	)	
	)	
Defendant <i>in Rem</i> .	)	

**DECLARATION OF CAROL E. HEAD**

I, Carol E. Head, make the following declaration:

1. I am an Assistant United States Attorney. I represent the plaintiff, the United States of America, in this case. This is an action *in rem* for forfeiture of the defendant property, described as 7.23918814 BTC, 105.75351403 ETH, 636.11899592 AVAX, 14120.995091 USDT, 2,380,467,906.17 SHIB, and 319008151.01 PEPE seized from a Binance account associated with User ID XXXXX3280, on or about October 25, 2024 (the “Defendant Property”).
2. This action is governed by the procedures set forth in the Federal Rules of Civil Procedure and in Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.
3. As described in the Affidavit of Katrina P. Caulfield, United States Secret Service Special Agent, attached as Exhibit A to the Verified Complaint for Forfeiture *in Rem* (the “Complaint”) in this case, the Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) because it represents property, real or personal, which

constitutes or is derived from proceeds traceable to a violation of a specified unlawful activity, specifically violations of 18 U.S.C. § 1343 (Wire Fraud). The Defendant Property is also subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it represents property, real or personal, involved in a transaction, specifically violations of 18 U.S.C. § 1956(a)(1)(B(i) and (h) (money laundering and conspiracy to commit money laundering) or property traceable to such property. The Defendant Property represents proceeds of, and property involved in, an online cryptocurrency investment scam.

4. The Complaint was filed on February 19, 2025. *See* Docket No. 1.

5. This Court issued a Warrant and Monition on February 20, 2025, directing the United States to give notice to all persons concerned that the Complaint had been filed and to arrest and retain the Defendant Property in its custody. *See* Docket No. 3.

6. Publication of the Complaint and Warrant and Monition was made via the government website [www.forfeiture.gov](http://www.forfeiture.gov) for thirty consecutive calendar days beginning on February 24, 2025, and ending on March 25, 2025. The Declaration of Publication was filed on July 24, 2025. *See* Docket No. 4.

7. All parties who may have had an interest in the Defendant Property (Victim-1, Avwerosuo Omokri, and Binance) were served with a certified copy of the Warrant and Monition and a copy of the Complaint by certified mail or by other reasonable means, such as electronic service and/or FedEx. The Declaration of Carol E. Head Regarding Service of Process was filed on July 24, 2025. *See* Docket No. 5.

8. All parties who may have had an interest in the Defendant Property who were later identified after the filing of the Warrant and Monition (Victim-2, Victim-3, Victim-4, Victim-5, Victim-6, and Victim-7) were served with a certified copy of the Warrant and

Monition and a copy of the Complaint by certified mail or by other reasonable means, such as electronic service and/or FedEx. The Declaration of Carol E. Head Regarding Service of Process was filed on July 24, 2025. *Id.*

9. Under Rules G(5)(a)(ii)(A)-(B) and G(5)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, any person asserting an interest in the Defendant Property was required to file a claim within thirty-five (35) days after direct notice was sent, or sixty (60) days after the first day of publication of notice on [www.forfeiture.gov](http://www.forfeiture.gov), and then was required to file an answer within twenty-one (21) days after filing their claim.

10. To date, no claims to the Defendant Property or answers to the Complaint have been filed, and the time for filing such claims and answers has expired. The United States has received or anticipates receiving petitions for remission, pursuant to 28 C.F.R. Part 9, from the identified victims asking the Attorney General to remit the Defendant Property to victims after entry of a final judgment and order of forfeiture.

11. To the best of my knowledge, and upon information and belief, no one with an interest in the Defendant Property is in the military service of the United States, is an infant, or is incompetent.<sup>1</sup>

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<sup>1</sup> To determine military status, the United States is able to query the Department of Defense Manpower Data Center using an individual's full name and either their Social Security Number or their date of birth. The United States searched the Department of Defense Manpower Data Center with negative results, except that the United States was unable to query Avwerosuo Omokri because it did not have a date of birth or a Social Security Number. The United States also could not locate any record of Avwerosuo Omokri being a citizen of the United States.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed this 1st day of August 2025, in Boston, Massachusetts.

/s/ Carol E. Head  
CAROL E. HEAD  
Assistant United States Attorney